

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM  
POWER PRODUCTS MARKETING, SALES  
PRACTICES, AND PRODUCTS LIABILITY  
LITIGATION

No. 3:16-md-02738-MAS-RLS

**DECLARATION OF JESSICA DAVIDSON IN SUPPORT OF  
DEFENDANTS JOHNSON & JOHNSON AND LLT MANAGEMENT,  
LLC'S OPPOSITION TO THE PLAINTIFFS' STEERING COMMITTEE'S  
RESPONSE TO THE COURT'S APRIL 30, 2024 MEMORANDUM AND  
ORDER REGARDING JUDGE WOLFSON'S *DAUBERT* OPINION ON  
GENERAL CAUSATION**

I, Jessica Davidson, declare as follows:

I am an attorney and a partner with the law firm Skadden, Arps, Slate, Meagher & Flom LLP, counsel for Defendants Johnson & Johnson and LLT Management, LLC (hereafter, "Defendants") in the above-captioned matter. The facts stated in this Declaration are true of my own personal knowledge. I submit this Declaration in Support of Defendants' Opposition to the Plaintiffs' Steering Committee's Response to the Court's April 30, 2024 Memorandum and Order Regarding Judge Wolfson's *Daubert* Opinion on General Causation, in the above case.

1. Attached hereto as **Exhibit 1** is a true and correct copy of Wentzensen & O'Brien, *Talc, Body Powder, and Ovarian Cancer: A Summary of the Epidemiologic Evidence* 163 Gynecol. Oncol. 199 (2021).
2. Attached hereto as **Exhibit 2** is a true and correct copy of O'Brien, *Douching and Genital Talc Use: Patterns of Use and Reliability of Self-Reported Exposure*, 34(3) Epidemiology 376 (2023).
3. Attached hereto as **Exhibit 3** is a true and correct copy of Goodman, *Quantitative Recall Bias Analysis of the Talc and Ovarian Cancer Association*, 7 Glob. Epidemiol. 1 (2024).
4. Attached hereto as **Exhibit 4** is a true and correct copy of Davis, *Genital Powder Use and Risk of Epithelial Ovarian Cancer in the Ovarian Cancer in Women of African Ancestry Consortium*, 30(9) Cancer Epidemiol. Biomarkers Prev. 1660 (2021).
5. Attached hereto as **Exhibit 5** is a true and correct copy of Chang, *Use of Personal Care Product Mixtures and Incident Hormone-Sensitive Cancers in the Sister Study: A U.S.-Wide Prospective Cohort*, 183 Environ. Int'l 1 (2024).
6. Attached hereto as **Exhibit 6** is a true and correct copy of Burke, *Executive Summary of the Ovarian Cancer Evidence Review Conference*, 142(1) Obstet. Gynecol. 179 (2023).

7. Attached hereto as **Exhibit 7** is a true and correct copy of a Letter from Steven M. Musser, Ph.D., Deputy Director for Scientific Operations, Center for Food Safety & Applied Nutrition, to Samuel S. Epstein, M.D., Cancer Prevention Coalition, University of Illinois – Chicago School of Public Health (April 1, 2014).
8. Attached hereto as **Exhibit 8** is a true and correct copy of the Declaration of Gregory Diette, May 28, 2024, in this case.
9. Attached hereto as **Exhibit 9** is a true and correct copy of the Third Amended Report of Rebecca Smith-Bindman, May 28, 2024, in this case.
10. Attached hereto as **Exhibit 10** is a true and correct copy of relevant excerpts of the transcript of the deposition of Rebecca Smith-Bindman, March 20, 2024, in this case.
11. Attached hereto as **Exhibit 11** is a true and correct copy of Micha, *Talc Powder and Ovarian Cancer: What is the Evidence?*, 306 Arch. Gynecol. Obstet. 931 (2022).
12. Attached hereto as **Exhibit 12** is a true and correct copy of Lynch, *Systematic Review of the Association Between Talc and Female Reproductive Tract Cancers*, 5 Frontiers in Toxicology 1 (2023).
13. Attached hereto as **Exhibit 13** is a true and correct copy of Gonzalez, *Douching, Talc Use, and Risk of Ovarian Cancer*, 27(6) Epidemiology 797 (2016).

14. Attached hereto as **Exhibit 14** is a true and correct copy of Merritt, *Talcum Powder, Chronic Pelvic Inflammation and NSAIDs in Relation to Risk of Epithelial Ovarian Cancer*, 122(1) Int'l J. Cancer 170 (2008).

15. Attached hereto as **Exhibit 15** is a true and correct copy of relevant excerpts of the transcript of the deposition of Rebecca Smith-Bindman, October 1, 2021, in this case.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: August 22, 2024



---

Jessica Davidson